# CORRESPONDENCE TO AND FROM AMERICAN ENVIRONMENTAL MANAGEMENT CORPORATION 1985 TO 1987

RECEIVED
SEP 16 1985

### GENERAL (28) ELECTRIC

APPARATUS AND ENGINEERING SERVICES

APPARATUS AND ENGINEERING SERVICES

ANDUSTRIAL

OFFICIAL GENERAL ELECTRIC COMPANY • P.O. BOX 909 • PORTLAND, OREGON 97207

OFFICIAL GENERAL ELECTRIC COMPANY • P.O. BOX 909 • PORTLAND, OREGON 97207

BCC: JACK PFRIMMER PAUL SCHATZ

TED EVANS - 00FRED JOHNSON

September 5, 1985

Douglas A. Lockwood American Environmental Management Corp. 11855 White Rock Rd. Rancho Cordova, Ca. 95670

Hello Doug:

Just a note to confirm our telephone conversation last week. As we agreed AEM will charge us \$25.00 per sample which includes the gas chromatograph analysis for PCB.

We all look forward to working with you and your team in the year's to come.

Sincerelly,

J. R. Hamer

APPARATUS AND ENGINEERING SERVICES
GENERAL ELECTRIC COMPANY ● P.O. BOX 909 ● PORTLAND, OREGON 97207

September 27, 1975

Mr. Douglas A. Lockwood

RECEIVED

OCT 02 1985

1 & S E - INDUSTRIAL SAN FRANCISCO DISTRICT R, D, FENN, MANAGER

AMERICAN ENVIRONMENTAL MANAGEMENT CORP. 11855 White Rock Road Rancho Cordova, CA 95670

### Hello Doug:

Just a note to confirm our telephone conversation of September 11, 1985. As we agreed AEM will charge us \$20.00 per samples based on larger quantities, which includes the gas chromatograph analysis for PCB.

We all look forward to working with you and your team in the years to come.

Sincerely,

Jan R. Hamer

Manager - PCB Service Sales Support

Western Service Department

JRH:js

bcc: J. Pfrimmer - A&ES/Walnut Creek

P. Schatz - A&ES/Walnut Creek

T. Evans - A&ES/Oakland

F. Johnson - A&ES/Portland

K. Richards - A&ES/Oakland

K. Schwartz - A&ES/Oakland

OMESTIC APPARATUS AND ENGINEERING SERVICES OPERATIONS

• MAIL ADDRESS: 1390 South Main St. 3rd Floor Walnut Creek, CA

. TELEPHONE:

8\*428-2213

November 14, 1985

cc: J.G. Pfrimmer
J.R Hamer
R.L. Johnson

SUBJECT: MANIFESTS

\_Ted\_Evans. - Oakland Karen Schwartz - AEM

Over the past few days I have had a number of discussions with Barbara Rhodes, DOHS, in an effort to determine what forms of manifesting to AEM were permissible. Since AEM is the HW Permit holder, they need to be shown first whether they are the generator or receiving facility. The format as shown below is also needed for their computerization of records.

### Inbound Manifests

Block 9 AEM/General Electric Company

AEM's Address

Block 10 AEM's EPA ID#

### Outbound Manifests

Block 1 AEM's EPA ID#

Block 3 AEM/General Electric Co./PG&E

or

AEM/General Electric Co./Multiple List Attached

Barbara has reviewed this with Jerry Bucklin and Doug Lockwood and both indicated acceptance of this format.

Ted, would you please advise the PG&E components to manifest as shown above. We also need to use this format when manifesting any loads to AEM from other customers. Outbound manifests should also be prepared as shown above.

Paul Schatz
P.C. Schatz

/rb :

- not approved el was not informed this vextra re-written - l'oads, needs told me this often 12/31/86.

questionable

### MEMORANDUM

TO: Mark Thomason, PCB Crew Foreman, AEMC

FROM: Deneen Dorsey \ CB Facility Supervisor, GE Co.

SUBJECT: Extra Work Service Orders

DATE: September 3, 1986

All extra work performed by American Environmental Management Corporation, which is billable to General Electric Company, must have a service order prepared and issued to me for approval at least two working days following the date the extra work was actually done.

This is effective as of today.

c: Doug Lockwood, AEM Corp. R. L. Johnson, G.E. Co.

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APPARATUS AND ENGINEERING SERVICES • SAN FRANCISCO INDÚSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY • 7777 PARDEE LANE • OAKLAND, CALIFORNIA 946Ω1 •(415) 639-5301

June 18, 1986

bec. Dick Ted Keith File

Mr. Doug Lockwood American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

Reference: General Electric Service Orders

Dear Doug:

Effective today, all G.E. "extra work" service orders must be approved and authorized by me prior to submitting the invoice to the G.E. Oakland office.

The following information will be required on all service orders:

- 1). GE/AEMC job number.
- 2). Inbound manifest number and,
- 3). Complete description of all extra services performed on the job; i.e., if the job required drilling holes in the transformers than each transformer item number must be provided.

These service orders must be submitted to me within three (3) working days of the work performed. Fayment will only be made for approved charges.

If you have any questions, please do not hesitate in calling me at 985-0115.

Thank-you.

Sincerely,

auen

Karen Schwartz General Electric PCB Site Manager

cc: Mr. Dave Lindsey, AEMC

rocived 1-8-8 SERVICE ORDER

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APPARATUS AND ENGINEERING SERVICES • SAN FRANCISCO INDUSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY • 7777 PARDEE LANE • ÖAKLAND, CALIFORNIA 94621 • (415) 639-5301

May 12, 1936

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N TO THE STATE OF THE STATE OF

Mr. Ed Leitch American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

Reference: AbsorbentoMaterial and Account of Account of

procedented: The armed: The state of the sta

Three of our loads GO166, GO169 and GO172 (shipped April 1, 3 and 4, respectively) were received at Envirosafe Services of Idaho, Inc. with liquid remaining in the transformers. ESI added additional absorbent so that these transformers could be properly disposed.

Greg Prindle advised me that a coarser form of vermiculite was used as absorbent in these transformers. Per the attached letter vermiculite is not an acceptable absorbent at ESI.

Acceptable absorbents are listed:

Please ensure that vermiculite is no longer used in future GE loads to ESI.

Thank-you.

Sincerely,

Karen Schwartz

General Electric PCB Site Manager

Attachment

cc: Mr. Greg Prindle, AEMC

Mr. Dick Johnson, GE

Mr. Ted Evans, GE

APPARATUS AND ENGINEERING SERVICES ● SAN FRANCISCO INDUSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY ● 7777 PARDEE LANE ● OAKLAND, CALIFORNIA 94621 ●(415) 639-5301

May 13, 1986

Mr. Ed Leitch American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

Reference: ESI Load G0161

Dear Ed:

Thirty-five (35) gallons of flammable liquid were received at AEMC on May 8, per the attached manifest and lab analyses. This liquid is from the paint containers shipped to ESI on March 27 as described in my letter of April 2, 1986.

Arrangements still need to be made to incinerate this material, Don Cadwell and I are working on this. Please advise and bill GE for the disposal of this material.

GE will bill AEMC for all costs incurred to sample, drum and return this liquid back to AEMC.

Sincerely,

Karen Schwartz

General Electric PCB Site Manager

Attachment

cc: Mr. Greg Prindle, AEMC

Fren Schulit

Mr. Don Cadwell, AEMC

Mr. Dick Johson, GE

Mr. Ted Evans, GE



### **Envirosafe Services of**

P.O. BOX 417, BOISE, IDAHO I (208) 384-1500

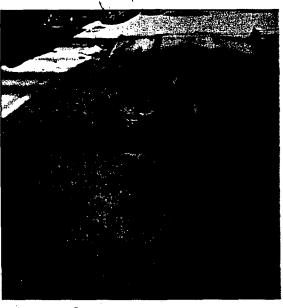
April 30, 1986

General Electric Co. c/o 11855 White Rock Road Rancho Cordova, CA 95670

ATTENTION: Ms. Karen Schwartz

RE: Manifest Document No. 84664676/G0161

Shipped 03/26/86



GE-SAC # 1614

Dear Ms. Schwartz:

In connection with the above referenced, you will find enclosed a photograph of the different types of small paint containers that were removed from the two (2) boxes of PCB contaminated debris that you shipped.

The liquid has been removed from the paint containers and drummed awaiting shipment back to you. The boxes and small containers have been disposed of as PCB contaminated debris.

Composite samples of the liquid were taken and analyzed for pH, flashpoint and PCB. The results are as follows:

Sample No.	Description	pH <sub>_</sub>	<u>Flashpoint</u>	j	PCB
1614.1	Silicone type	3083	90°F		30  mg/L
1614.2	Latex type	6.85	>210°F		30  mg/L
1614.3	Liquid in pail	7.20	< 70°F		30  mg/L
1614.4	Epoxy thinner	9.11	>210°F		30  mg/L

Should you have any questions or need any additional information, please do not hesitate to contact our offices.

Sincerely yours,

Cynthia Boughton Transportation &

Administrative Coord.

cb

cc: D. Aspitarte/ESII

ICF#PCB1614

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Reminder: DO NOT PUT ANY NON-PG+E OIL into Tank 5. USE AS FLUSH OR DRAIN INTO TANK 1 Thank-you. Taren 6-2-86

Meg. 25260 Dumo Tank 5 on Fuday May 30 per spur fluid report. The customer nedo to have this och incinerated Please diain 100 gallons from Tank 5 and refile these dumo. USE these to drumo as Faren 6-3-86 Please show this work being complete on fluid

Reminder

Lug,

On any given PG+E load

we need to have in our

records a PG+E bill of lading.

I the truck diver only

has one copy -make a verox

copy for our records.

Thank you

6-3-86

APPARATUS AND ENGINEERING SERVICES • SAN FRANCISCO INDUSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY • 7777 PARDEE LANE • OAKLAND, CALIFORNIA 94621 •(415) 639-5301

June 18, 1986

bec Dick Ted Keith File

Mr. Doug Lockwood American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

Reference: General Electric Service Orders

Dear Doug:

Effective today, all G.E. "extra work" service orders must be approved and authorized by me prior to submitting the invoice to the G.E. Oakland office.

The following information will be required on all service orders:

- 1). GE/AEMC job number,
- 2). Inbound manifest number and,
- 3). Complete description of all extra services performed on the job; i.e., if the job required drilling holes in the transformers than each transformer item number must be provided.

These service orders must be submitted to me within three (3) working days of the work performed. Payment will only be made for approved charges.

If you have any questions, please do not hesitate in calling me at 985-0115.

Thank-you.

Sincerely,

Taien

Karen Schwartz

General Electric PCB Site Manager

cc: Mr. Dave Lindsey, AEMC

APPARATUS AND ENGINEERING SERVICES ● SAN FRANCISCO INDUSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY ● 7777 PARDEE LANE ● OAKLAND, CALIFORNIA 94621 ●(415) 639-5301

July 10, 1986

Doug Lockwood American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA. 95670

Dear Doug:

Per our conversation of July 9, 1986, General Electric agrees to share a drum load to Ensco with American Environmental Management Corporation via your contained drum van. GE's cost will be \$2,800.00. This figure is based on GE using 44% of the van space. In the event additional or less space is used by GE, the proportional charge will be based on actual percentage of space used times \$6,500.00.

Sincerely,

Faren Schurack

Karen Schwartz General Electric PCB Site Manager American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA. 95670

cc: Ted Evans, GE Keith Richards, GE

APPARATUS AND ENGINEERING SERVICES ● SAN FRANCISCO INDUSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY ● 7777 PARDEE LANE ● OAKLAND, CALIFORNIA 94621 ●(415) 639-5301

July 10, 1986

Greg Prindle American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA. 95670

Dear Greg:

Per our conversation of July 10th, there will be no additional extra work service orders for material received through July 9th, other than for rush tank lab analyses.

Sincerely,

Faren Schwartz

Karen Schwartz General Electric PCB Site Manager American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA. 95670

cc: Doug Lockwood Ted Evans, GE Keith Richards, GE

### MEMORANDUM

TO: Mark Thomason, FCB Crew Foreman, AEMC.

FROM: Deneen Dorsey CB Facility Supervisor, GE Co.

SUBJECT: Extra Work Service Orders

DATE: September 3, 1986

All extra work performed by American Environmental Management Corporation, which is billable to General Electric Company, must have a service order prepared and issued to me for approval at least two working days following the date the extra work was actually done.

This is effective as of today.

c: Doug Lockwood, AEM Corp. R. L. Johnson, G.E. Co.

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September 8, 1986

Memo to:

Ed Leitch

Mark Thomason

From:

Doug Lockwood

RE:

G.E. Services

Per my discussion on 9-5-86 with Ted Evans, AEMC will implement the following procedures to minimize the possibility of contaminating the less-than-5 ppm tank:

- 1. Pre-test any drums prior to pumping contents into tank:
- 2. Keep log showing all drums pumped into all tanks;
- 3. Install a 500-gallon "day tank" to receive less-than-5 ppm oil. The tank will be tested prior to pumping into the large less-than-5 ppm tank.
- 4. Provide to G.E. a description of cleaning and analytical procedures used to clean the presently contaminated less-than-5 ppm tank.

Ted anticipates tankers to pump the tank on 9-8 and 9-15. Please discuss the cleaning and testing procedure (#4) with me before proceeding to clean the tank so I can prepare the report for G.E.

Also - the less-than- 5 ppm ais to be sampled daily and results reported to G.E.

9/9/86

## GENERAL ELECTRIC COMPANY C/O: American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

September 12, 1986

Mr. Doug Lockwood AEMC Vice President 11855 White Rock Road Rancho Cordova, CA 95670

Dear Doug:

Problems are arising out in the AEMC PCB yard which are effecting the proper scheduling of work that is do be done. Cancellations of ESI loads going out are being made with very little notice, trucks are delayed when they are here to take out a load, clean up of the contaminated tank, Tank # 5, hasn't even started (which should have been finished by now!) and so on.

Overall, too many mistakes are being made, things are being over looked and we need to have better coordination and control of all activities being performed in the PCB yard. I do feel that all the employees at AEMC oviding services for General Electric are doing an excellent job. All the employees know their jobs well, take pride in their work and are very valuable to the PCB clean-up efforts we are all working so hard at. However, some of the employees are becoming disgruntled due to lack of proper leadership and support, and feel like they'd rather be working in another area other than PCBs.

I am hoping that this problem doesn't go so far that we will end up losing some very valuable workers and fail in providing good services to our customers. I would like to suggest AEMC hold some kind of round table discussion which includes the entire PCB crew, yourself and Ed leitch. If I can be of any help I would like to attend. I feel we have an excellent team of workers here and know these problems can be resolved if they are addressed as soon as possible!

**ሂ**ery truly y**q**urs,

Deneen Dorsey

General Electric PCB Facility Supervisor

r: R.L. Johnson - Ed Leitch checked

## GENERAL ELECTRIC COMPANY C/O: American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

### MEMORANDUM

October 15, 1986

TO:

D. Lockwood

D. Loughnane

T. McConnell

K. Terrio

From:

Deneen Dorsey

SUBJECT: PGandE PCB Material Picked Up By AEMC

On September 29, 1986 AEMC picked up PCB material from PGandE in Eureka, CA. without prior approval from myself, or an authorized General Electric employee. Also, the manifest and accompaning paperwork was not given to me until the following week after receipt of this material at AEMC. (Please see the attached manifest).

When this particular milkrun was scheduled by AEMC someone should have known that PCB material was going to be picked up at PGandE in Eureka and notified me immediately explaining the circumstances. If AEMC did not know that PCB material was going to picked up until they were on the customer's site, the transporter would have known at that time that he/she would be hauling waste polychlorinated biphenyl's and should have notified me before transporting the material.

It should be emphasized that AEMC shall not pick up any PCB material from PGandE without authorization from General Electric prior to the pick-up. Should this happen in the future, I would like to be notified in advance and be given the original manifest and accompanying paperwork upon receipt of the material at AEMC.

### Attachment

c: R.L. Johnson T.E. Evans P.C. Schatz Bob Comyns

Files

4	N	WASTE MANIFEST	1. Generator's (1970%)		Docun	nifest nent No.	2. Pag of	is not i	equired	shaded areas by Federal
		3. Generator's Name and Mailing Address PACIFIC GAS AND ELE HUMBOLDT BAY POLOG 1. Generator's Phone (707) 44	CTRIC (C) RR PLANT EUREKA 3-2787	T - BUHNE >						
	L	5. Transporter 1 Company Name  **MECICAN ENVIRONMENT  MANALEMENT CORPOR  7. Transporter 2 Company Name	AC. ATION	I. US EPA I CADAROS S I. US EPA	1118	3				, and
		9. Designated Facility Name and Site A ANIERICAN ENVIRONHENTIAL HO 11855 WHITE POUR ROAD BANCHO CORDOVA, CA. 95	uticcer, /ci	O. US EPA ENERHLEHEATA CAD 98088	ic co	•				
		11. US DOT Description (Including Proper Sh	<del></del>	azard Class, and ID N	umber)	12.Conta	Type	13. Total Quantity	14. Unit Wt/Vol	
	ENER	B. WASTE POLYCHION CRME, UN 2315	USTAGIŞ	BIPHPAPE		00.1	cW	200	P	
1	A T D	<b>b</b> .					·			
		c.	·		. 1					
3		d.		·	·		·			
200000		15. Special Handling Instructions and Adults Personal Protection	iditional inform	nation			112 7 1728			
		16. GENERATOR'S CERTIFICATION: I hereby	declare that the	e contents of this con	signmer	at are full	v and a	Tourstely descri	h#2	1037
		above by proper shipping name and are of for transport by highway according to	classified, packe	d, marked, and labele rnational and nation	d, and a	re in all re	spects	In proper condi-	lon	Date
1	V	Printed/Typed Name TERRY Williams		Signature	lepan	ر لىق	llia	we	_	onth Day Year CI 29 86
	TRANSPO	Printed/Typed Name  Printed/Typed Name  TOM MAGNE  18. Transporter 2 Acknowledgement of I	۲۲	Signature	m	7	ng	gre		Date Onth Day Year 0.912918£ Date
-	AT ER	Printed/Typed Name	TOOOLDY OF MARK	Signature					<u></u>	onth Day Year
	FAC	19. Discrepancy Indication Space				. • * * * * * * * * * * * * * * * * * *				
	-	20. Facility Owner or Operator: Certification item 19.	n of receipt of h	azardous materials c	overed b	y this m	anifest	except as noted	l In	Date
	1	Printed/Typed Name Kevin Terrin	TOFOR	Signature	Pen	Z	mi	·		onth Day Year

DHS 8022 A (11/84) (EPA 8700-22) Whit

3DF SENDS THIS COPY TO DOHS WITHIN 30 DAYS 3: P.O. Box 3000 Sacramento CA 95812

TSDF COOL?

84 89641

October 27, 1986

Mr. Doug Lockwood, Vice President American Environmental Management Corp. 11855 White Rock Road Rancho Cordova, CA 95670

### Dear Doug:

As you know, there has been ongoing problems with the processing of GE PCB loads by AEMC. This is partially due to the PCB crew being short handed and the volume of loads we have been receiving these past few weeks. Some of the problems are getting better. All loads that have been sampled have been pumped and we are averaging two outgoing loads to ESI and Berman Metals each week.

After working this weekend I have noticed other problems which are critical and must be resolved immediately. When walking through the yard I noticed approximately 8 loads in the yard which were received on dates 10/17/86 thru 10/24/86 which have not been numbered yet. This should be done as soon as the load is received and the manifest signed off. If this isn't done right away we start losing control as to which items came with what load and etc. Paperwork from these loads are given to me with a job number assigned to each load and item numbers for material received on the respective load. When these are inputted we are assuming that the load has been numbered, all items are accounted for and that we have an accurate account for every item in that is in the yard.

As the volume of loads coming in remains unpredictable the following procedures should be followed for all incoming material:

- 1. Manifest signed with all items received accounted for and discrepancies noted.
- 2. Load numbered as soon as manifest is signed off and paperwork given to me on the same day the load is received.
- 3. Load arriving early samples taken the same day. Late arrival of load samples taken the following day.

NOTE: Loads should be processed in the order that they are received.

- 4. PPM results written on items from the load, items pumped, drained and flushed accordingly.
- 5. Material going to ESI absorbed and staged for shipment. Berman items loaded on trailer ready to ship.
- (All loads should be processed within 3-5 days after receiving material).

Capacitors and debris items that come in need to be weighed and checked shortly after arrival. This procedure is standard.

Other items of concern are loads being stored outside of the designated hazardous waste storage area. (This would be a critical issue during an EPA, or DOHS inspection). Also, items piling up next to the end-dump area and not being placed into the end-dump as soon as they are ready.

This week I have ESI scheduled to go out today, 10/29/86 and 10/30/86. Berman loads will go out 10/29/86 and 10/31/86. (An additional Berman load may go out either Thursday or Friday). Next week I have ESI scheduled to go out 11/3/86, 11/5/86 and 11/6/86. Berman will probably go out 11/3/86, 11/5/86 and 11/7/86. With the amount of material we have in the yard I do not see why we cannot meet these ship dates.

I am hoping that by calling these problems to your attention that you will take measures to resolve these issues.

Very Sincerely,

Deneen Dorsey

PCB Facility Supervisor

R.L. Johnson T.E. Evans

APPARATUS AND ENGINEERING SERVICES ● SAN FRANCISCO INDUSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY ● 7777 PARDEE LANE ● OAKLAND, CALIFORNIA 94621 ●(415) 639-5301

April 2, 1986

Mr. Ed Leitch American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

REFERENCE: ESI LOAD GO161 DISCREPANCIES

Dear Ed:

The following problems were noted by Envirosafe Services of Idaho, Inc. upon receipt of the above mentioned load on March 27, 1986.

- 1. Some transformers required additional absorbent.
- 2. Two debris boxes (85198D-01 and 85198D-02) contained a battery and paint cans full of liquid.

I have requested ESI to prepare a cost estimate to properly prepare these boxes for burial. I will advise you upon acknowledgement of this estimate.

Yours truly,

Káren Schwartz

General Electric Site Manager American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

cc: Mr. Greg Prindle, AEMC Mr. Ted Evans, GE

APPARATUS AND ENGINEERING SERVICES ◆ SAN FRANCISCO INDUSTRIAL DISTRICT GENERAL ELECTRIC COMPANY ◆ 7777 PARDEE LANE ◆ OAKLAND, CALIFORNIA 94621 ◆(415) 639-5301

April 11, 1986

Mr. Doug Lockwood American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

Reference: PGandE PCB Telephone Calls

Dear Doug:

Please notify all appropriate personnel that all phone calls from PGandE regarding PCB material should be forwarded to me at (916) 985-0115.

Sincerely,

Karen Schwartz

General Electric Site Manager, AEMC

cc: Mr. Ted Evans, General Electric Company

Effective Immediately

For any transformer liqued that goes into Tark 2 hou need to know approximately how many gallons please fell this in under remarks This reguest is do to not being able to read liquid level gauge more accurately than than than than than

APPARATUS AND ENGINEERING SERVICES ● SAN FRANCISCO INDUSTRIAL DISTRICT GENERAL ELECTRIC COMPANY ● 7777 PARDEE LANE ● OAKLAND, CALIFORNIA 94621 ●(415) 639-5301

April 17, 1986

Mr. Doug Lockwood American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

Reference: PGandE PCB Material

Dear Doug:

Another incident has occurred where AEMC has picked up PGandE PCB material without General Electric's authorization. On April 15, two drums of contaminated hydraulic fluid and one drum of contaminated oil and water were picked up at the PGandE Concord facility. This material was shipped under State Manifest Number 84530132.

This issue must be resolved immediately. All AEMC personnel should be notified that PGandE PCB material must be handled through General Electric.

Sincerely,

Karen Schwartz

Kuen Schwarty

General Electric Site Manager American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

cc: Mr. Paul Schatz, General Electric Company Mr. Ted Evans, General Electric Company

APPARATUS AND ENGINEERING SERVICES ● SAN FRANCISCO INDUSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY ● 7777 PARDEE LANE ● OAKLAND, CALIFORNIA 94621 ●(415) 639-5301

May 12, 1936

Mr. Ed Leitch American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA 95670

Reference: Absorbent Material

Dear Ed:

Three of our loads G0166, G0169 and G0172 (shipped April 1, 3 and 4, respectively) were received at Envirosafe Services of Idaho, Inc. with liquid remaining in the transformers. ESI added additional absorbent so that these transformers could be properly disposed.

Greg Prindle advised me that a coarser form of vermiculite was used as absorbent in these transformers. Per the attached letter vermiculite is not an acceptable absorbent at ESI. Acceptable absorbents are listed.

Please ensure that vermiculite is no longer used in future GE loads to ESI.

Thank-you.

Sincerely,

Karen Schwartz

General Electric PCB Site Manager

Attachment

cc: Mr. Greg Prindle, AEMC

Mr. Dick Johnson, GE

Mr. Ted Evans, GE



### Envirosafe Services of Idaho, Inc.

P.O. BOX 417, BOISE, IDAHO 83701 (208) 384-1500

April 30, 1986

General Electric Co. c/o 11855 White Rock Road Rancho Cordova, CA 95670

ATTENTION: Ms. Karen Schwartz

Dear Ms. Schwartz:

As you are aware, Envirosafe Services of Idaho, Inc. does not feel that vermiculite is an acceptable absorbent to be used in drained and/or drained & flushed transformers or any other PCB item that requires absorbant to be added in case of residue liquids.

The following is a listing of different absorbents that have been tested/tried and found to be acceptable:

Safe & Dri; Oil Dry; Floor Dry and Superfine. Basically any non-biodegradable mineral absorbent with the exception of vermiculite is acceptable.

Please ensure that vermiculite is no longer used after you have depleted your inventory. Should you have any questions, please do not hesitate to contact our offices.

Sincerely yours,

Cynthia Soughton

Transportation &

Administrative Coord.

cb

cc: D. Aspitarte/ESII

APPARATUS AND ENGINEERING SERVICES ● SAN FRANCISCO INDUSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY ● 7777 PARDEE LANE ● OAKLAND, CALIFORNIA 94621 ●(415) 639-5301

July 10, 1986

Doug Lockwood American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA. 95670

Dear Doug:

Per our conversation of July 9, 1986, General Electric agrees to share a drum load to Ensco with American Environmental Management Corporation via your contained drum van. GE's cost will be \$2,800.00. This figure is based on GE using 44% of the van space. In the event additional or less space is used by GE, the proportional charge will be based on actual percentage of space used times \$6,500.00.

Sincerely,

Facen Schurat

Karen Schwartz General Electric PCB Site Manager American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA. 95670

cc: Ted Evans, GE Keith Richards, GE

APPARATUS AND ENGINEERING SERVICES ● SAN FRANCISCO INDUSTRIAL DISTRICT
GENERAL ELECTRIC COMPANY ● 7777 PARDEE LANE ● OAKLAND, CALIFORNIA 94621 ●(415) 639-5301

July 10, 1986

Greg Prindle American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA. 95670

Dear Greg:

Fer our conversation of July 10th, there will be no additional extra work service orders for material received through July 9th, other than for rush tank lab analyses.

Sincerely,

Karen Schwart

Karen Schwartz General Electric PCB Site Manager American Environmental Management Corporation 11855 White Rock Road Rancho Cordova, CA. 95670

cc: Doug Lockwood Ted Evans, GE Keith Richards, GE



March 18, 1987

### MEMORANDUM

TO: PCB PERSONNEL

FROM: Greg Loughnane

RE: PCB Activities and Responsibilities

In the absence of a designated leadman for the PCB facility Joe Ormonde and Glenn Gabonia are presently filling the role of "acting" leadman. Their responsibilities are broken down as follows:

- 1. "Inside" (PCB room) activities: JOE ORMONDE
  - --supervision of PCB Personnel
  - --pumping all transformer loads
  - --pump and air compressor maintenance
  - --handling associated paperwork (daily fluid reports, decomissioning sheets, etc.)
- 2. "Outside" activities: GLENN GABONIA
  - --supervision of PCB Personnel
  - --inspection and off-loading incoming loads
  - --sampling loads
  - --loading outgoing loads
  - --daily forklift inspection
  - --associated paperwork (load sampling results, outgoing load sheets, etc.)

Depending on the flow of loads in and out of the facility the responsibilities will overlap at times and your activities will vary. Glenn and Joe will be responsible for scheduling your activities, overtime, starting times, etc. Please give them your full cooperation in maintaining the good performance achieved by the entire PCB crew.

cc: Doug Lockwood Deneen Dorsey Kevin Terrio

### GENERAL ELECTRIC COMPANY

C/O: American Environmental Management Corp. 11855 White Rock Road Rancho Cordova, CA 95670

Deneu Doply

### MEMORANDUM

April 29, 1987

To:

Doug Lockwood

From:

Deneen Dorsev

Subject: April 28, 1987 Bulk Shipment from Tank #1

On April 28, 1987 I scheduled a tanker to pick up oil from Tank #1. I had asked to have that tank sampled the evening before hand. After the sample was ran the PCB concentration was 54 ppm. Someone had assumed this sample was not accurate and thought another test should be taken. I had not been notified about the 54 ppm test result until after the second analysis was ran-

In the morning we pumped 7 drums of liquid into the tank before the second test was ran. This test came out to be 220 ppm. When discussing these matters with the chemist, George Hamilton, he assured me that these readings were accurate. A third test was ran, after agitating the liquid in the tank, and it showed the liquid to be 64 ppm.

All items pumped into tank #1 were pre-tested at AEM with the exception of the items I have highlighted on the attached sheet. The characteristics of the three test analyses indicate that askeral, or liquid with a high concentration of PCB, was added to the tank. It is difficult to pin point the problem but some things which could have happened include:

Pumps and hoses used to drain transformers into Tank #1 had small amounts of askeral left in the lines.

Sample vials holding liquid from untested transformers getting mis-marked, e.g. test sample for  $\times mfr$ . A getting labeled B.

An error made when writing the ppm concentration on the transformer before pumping.

Transformers designated to go into Tank #2 getting pumped into Tank #1.\*

Pre-tested items with test results not being representative of the actual ppm concentration of the liquid received. In order to prevent future problems like this one from occurring operating procedures for pumping and testing transformers need to be developed and strictly followed. This would include:

Operator in the pumping room must ensure that hoses and pumps used to pump transformers are clean. That is, free of any askeral or residual high concentration PCB liquid. Equipment dedicated to a particular tank should be the only equipment used to pump items going into that tank.

Technicians pulling samples from transformers need to take extra care when sampling transformers and labeling vials. Also, representative samples must be collected in order to determine the actual ppm level of a particular item.

Double check the ppm's written on the transformers with the actual lab report before pumping the transformers.

Ensure that items are color coded correctly and pumped into their designated tanks.

I will ensure that all items coming in pre-tested are screen tested before pumping into Tank #1, as I do with items getting pumped into Tank #5. Too often we learn the hard way that lab analysis are not always representive of the liquid actually contained in a particular drum or transformer!

Before this incident occurred all fluid reports have accurately reported liquids going into their designated tanks, with the exception of gauge measurement problems we've been having with Tank #2. This has been an on going problem which I have discussed with you, Greg Laughnane and Joe Ormonde. Often times items are pumped into Tank #2, which by nameplate are over 100 gallons, and the gauge measurement doesn't move. Typically the gauge should move about 2 1/2 inches. This is a problem which still needs attention and should be remedied as quickly as possible.

I would also like to ask that whenever I have a tank sampled that I see the results first hand, not before someone else decides the sample was inaccurate.

Attachments

c: Jack Pfrimmer Ted Evans Greg Laughnane

# GENERAL ELECTRIC COMPANY AEMC-DECOMMISSIONING FACILITY ITEMS AVAILABLE FOR SHIPPING REPORT 04/29/87 PAGE NO. 1

Disposal Facility: 16 TANK 1

	JOB NO.	TYPE	PPM DESCR	RIPTION	WEIGHT O/S	RECEIVED
	85622 X-001	FSR NO: BU	068P0622 <50 4	P. G & E GALLONS	- 680 DADO ST. SAN J	OSE 02/27/87
2	(85632A	FSR NO:	06860632	GENERAL	ELECTRIC COMPANY OAK 15 75 03/04/87	LAND
. 3	85435	FSR NO:	048P0435	PG&E		•
4					EMERYVILLE OIL 202 03/17/87	03/18/87
5					- 680 DADO ST. SAN J OIL 1035 03/18/87	
4			068P0639 <50 303		FRESNO OIL 2272 03/18/87	03/19/87
7					-CAD981390149 MARYSV OIL 2760 03/24/87	
8					-4801 DAKLAND ST BAK BIL 120 03/24/87	
9					-CAD981390149 MARYSV DIL 990 03/26/87	
10					-CAD981382195 ROHNER	
11					EMERYVILLE OIL 352 03/27/87	03/30/87
12			048P0450 <50 157		FRESNO OIL 1177 03/27/87	03/30/ <b>87</b>
13					-CAD981390149 MARYSV	
					PRICE CANYON RD PIS OIL 247 03/03/87	

# GENERAL ELECTRIC COMPANY AEMC-DECOMMISSIONING FACILITY ITEMS AVAILABLE FOR SHIPPING REPORT 04/29/87 PAGE NO. 2

Disposal Facility: 16 TANK 1

ITEM	JOB NO.	TYPE	PPM DESC	RIPTION	WEIGHT	O/S	RECEIVED
	85653	FSR NO:	048P0453	PG&E	FRESNO		: <b></b>
15	X-001	BU	<50 212	GALLONS	DIL 159	0 03/31/87	04/01/87
					CHICO		
16	001	BU	38 2917	GALLONS	OIL 2187	7 04/01/87	04/01/87
					EMERYVILL		
17	X-002	BU	<50 97	GALLONS	DIL 72	7 04/06/87	04/07/87
						195 ROHNER	
. 18	X-002	BU	<50 41	GALLONS	DIF 30	7 04/09/87	04/10/87
						149 MARYSV	
19	X-002	BU	<50 51	GALLONS (	31L 38	2 04/13/87	04/15/87
and the second s						149 MARYSV	
20	X-002	BU	<50 172	GALLONS (	DIL 129	0 04/13/87	04/15/87
						195 ROHNER	
21	X-002 ·		<50 B∵ จูกใ	GALLONS (	OIL 6	0 04/15/87	04/16/87
	85670B	FFR NO:1	<i>DOSEPOSTO</i>	P G & E	-CAD981578	156 ROHNER	r PARK
22	001	Bas L	10 53.6	O BUOLLA	<b>10</b> 39	8 04/13/87	04/16/87
23 24	002	L \$	7 50 G	ALLINS, U	KC 37	8 04/13/87 5 04/13/87	04/16/8/
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						ST. SAN JO	
25	X-002	BU	<50 259	GALLONS (	OIL 194	2 04/16/87	-04/17/87
	<b>(85673</b> 8.8	FER NO:	048G0473	STANFOR	D UNIV.HOSP	ITAL PALO A	ALTO
26	004	L	10 53.0	ALLONS O	39	8 04/16/87 8 04/16/87 8 04/16/87	04/17/87
27 28	005 006	L S			1666 37 1666 37	0 04/16/8/	04/1//8/
29		L §	10 53 G	ALLONS O	1125 39	8 04/16/87	04/17/87
	85679	ESR NO:	049P0479	PG&F	-C40991390	149 MARYSVI	
30						0 04/17/87	
	85682	ESR NO.	068P0682	PGSE	FRESNO	)	
31	X-002					7 04/20/87	04/21/87
			1 MB 52 MB bu 12 54 04 95 54				
31		TOTAL	_S		4669	9	

	·			$\mathbf{e}_{i}^{r}$
	MERICAN NMENTAL MANAGEMENT CORP.		Job	Joe Bronde
	oad, Rancho Cordova, California 95670 / (916) 985-6666		Date Rec'd	4/27/67
•			Comp. Date	4/28/87
ANALYTICA	L RESULTS — PCB		Batch	136
CLIENT: _	PG&E/GE	* *. *		
,				
			<del>-</del> /	Test # 1
· · · · · · · · · · · · · · · · · · ·		*	1	
ANALYSIS:	PCB's in transformer oils			

AEMC I.D.	Sample I.D.	PCB Content (ppm)	1242 1260	
007757	from Tank # 1 5-5010n 4-27-87	1/		
<del></del>		54 nom	1200	

Mary ton 14/25/19
George Hampton Date

cc: General Electric

A	ME	RIC	AN
ENVIR	ONMENTAL	. MANAGEN	IENT CORP.

11855 White Rock Road, Rancha Cordova, California 95670 / (9ló) 985-6666

Job

Date Rec'd 4/28/87

Comp. Date 4/28/87

Batch /36

ANALYTICAL RESULTS — PCB

CLIENT: PG&E/GE

Test #2

ANALYSIS:	PCB's in transformer oils	:		
			 •	

AEMC I.D.	Sample I.D.	PCB Content (ppm)	Arochlor		
0.08855	T115	50	1242		
007758	Tonk 1 5-50ppm	170	1200		
		220 ppm			
	ζ				

George Hampton 14/28/87

Date

	· · · ·		
AMER	ICAN	Job	
ENVIRONMENTAL MANAGEMENT CORP.  11855 White Rock Road, Rancho Cordova, California 95670 / (916) 985-6666		Date Rec'd ∠	2/28/87
	2 Comon Rd 400/07 (40) 400 0000	Comp. Date	4/28/87
ANALYTICAL RESULTS — PCB		Batch	136
CLIENT: PG&E/GE			
		_ Too	ST#3
		/1-	
ANALYSIS: PCB's in	transformer oils		
ANALYSIS.			
AEMC I.D.	Sample I.D.	PCB Content (ppm)	Arochior
007759	T. 1 st.	15	12-42-
001103	Tonk #1	49	1260
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A Jan 1972 George Hampton Date

c: General Electric

GENERAL ELECTRIC COMPANY

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The State of Light

From# Denéen Dorsey region of arthree comments

Subjéctiv April 28; 1987 Bulk Shipment from Tánké#1 👀

81 mg

On April 28,91987 Í schéduleð 42 tánker to pick úgfóil fróm Tánk #1: I had asked to have that tank sampled the evening before hand. After the sample was ran the PCB concentration was 54 ppm. SomeOne Mad assumed this sample Was not accurate and thought another test should be taken. "I had not been notified about the 54 ppm test result until after the second analysis was 精的物质分数 医野豆醇 高的的 人名阿德 人名巴克伊斯特拉 一声点 "天孝"大门下,然后脑上挥起一头,看自身一直,搬走这一的攀起去,奏一起

In the morning we pumped 7 drums of liquid into the tank before the second tëst was ran. This test came out to be 220 ppm: When discussing these matters with the Chemist, George Hamilton, he assured me that these :readings were accurate. A third test was ran, after agitating the liquid in the tank, and it showed the diquid to be 64 topms and the second section of the second

All ditems pumped into tank #1 were pre-tested at AEM with the exception of the items I have highlighted on the attached sheet. The characteristics of the three test analyses indicate that askeral; for liquid with a high concentration of PCB, was added to the tank. It is difficult to pin point the problem but some things which could have happened include:

Pumps and hoses used to drain transformers into Tank #1 had 🎂 🥶 😘 mall amounts of askeral left in the lines.

Sample vials holding liquid from untested transformers getting mis-marked, e.g. test sample for xmfr. A getting labeled B.

An error made when writing the ppm concentration on the transformer before pumping.

Transformers designated to go into Tank #2 getting pumped into Tank #1.\*

Pre-tested items with test results not being representative of the actual ppm concentration of the liquid received.



September 1, 1987

TO: . GREG LOUGHNANE/GLENN GABONIA/JOE ORMONDE

FROM: DOUG LOCKWOOD

SUBJECT: TANKER LOADING AT PCB FACILITY

It has come to my attention that there have been excessive delays in loading bulk oil tankers resulting in on-site time of as long as three and one-half hours. Since General Electric is charged for any loading time over one and one-half hours, this impacts our valued customer.

Please make your best efforts to ensure that we are prepared for the pumping operation before the tanker arrives so that delays are minimized and loading can be accomplished as quickly as possible. Thank you in advance for your cooperation.

DAL:bln

cc: Deneen Dorsey

Dorac. Le monter -

11855 White Rock Road, Rancho Cardova, California 95670 / (916) 985-6666